

COMMONWEALTH OF MASSACHUSETTS OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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William S. Stowe, Assistant General Counsel Boston Edison Company d/b/a NSTAR Electric 800 Boylston Street Boston, Massachusetts 02199

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 01-108

January 31, 2002

Dear Mr. Stowe:

Enclosed please find the Department's second set of information requests on the above-captioned matter. Responses should be filed on or before February 7, 2002. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr. Hearing Officer

cc: Mary Cottrell
Staff as assigned
Service List

Encl.

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BOSTON EDISON COMPANY))))	D.T.E. 01-108
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SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BOSTON EDISON COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

- 1. "BECo" or "Company" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
- 2. "Company Filing" or "Filing" means all the documents BECo filed in this proceeding.
- 3. "MWRA" means the Massachusetts Water Resources Authority.
- 4. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
- 5. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
- 6. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 7. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning

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Second Set of Department Information Requests to Boston Edison Company

documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

- 8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 9. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
- 10. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Owen Cahillane, Rates and Revenues Requirements Division; (3) Claude Francisco, Rates and Revenues Requirements Division; (4) Sean Hanley, Rates and Revenues Requirements Division.

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BOSTON EDISON COMPANY)))	D.T.E. 01-108
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SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO $\underline{BOSTON\ EDISON\ COMPANY}$

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter. The following questions pertain to the pre-filed testimony of Henry C. LaMontagne filed by Boston Edison Company ("BECo" or "Company") with the Department on January 25, 2002 (marked as Exhibit BEC-HCL).

- DTE 2-1 In reference to Exhibit BEC-HCL-2, Attachment B, does MWRA still pay the Energy Supply figure shown at 13 and 32 to the Company? Why is this figure added into the Totals shown at 14 and 33?
- DTE 2-2 In reference to Exhibit BEC-HCL-2, Attachment B, please recalculate the Percent Difference shown at 36, using the Total Delivery charge shown at 11 as the denominator.